

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

WYNN'S EXTENDED CARE, INC.,

Plaintiff,

v.

PENNY L. BRADLEY,

Defendant.

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: CIVIL ACTION NO. 5:13-cv-00114-MFU

**WYNN'S EXTENDED CARE, INC.'S ANSWERS TO PENNY L. BRADLEY'S  
FIRST INTERROGATORIES**

COMES NOW Wynn's Extended Care, Inc., by counsel, and serves the following answers to Plaintiff's First Set of Interrogatories.

A. The information supplied in the answers to interrogatories is not based solely on the knowledge of the executing party, but includes knowledge of the parties, their agents, representatives, and attorneys, unless privileged. The executing party has no first hand personal knowledge of the allegations as set forth in the plaintiff's Complaint.

B. The word usage and sentence structure of the answers to interrogatories may be that of the attorney assisting in the preparation of these answers and thus do not necessarily purport to be the precise language of the executing party.

C. The information contained in the answers to interrogatories is being provided in accordance with the provisions and intent of the rules of this Court which require the disclosure of facts which may be relevant or which may lead to the discovery of relevant information. Accordingly, the party answering these interrogatories and responding to the request, by providing the information requested, does not waive any objections to the admission in evidence of the information.

**EXHIBIT 14**

### **General Objections**

1. This Counterclaim Defendant objects to the “definitions and instructions” contained in the interrogatories to the extent that they seek to impose requirements beyond than those imposed by the Federal Rules of Civil Procedure. This Counterclaim Defendant will respond in accordance with said rules.

2. This Counterclaim Defendant objects to the definitions and instructions in the interrogatories to the extent that they seek information or materials prepared in anticipation of litigation, and/or that are privileged on the grounds of attorney-work product and/or attorney-client privilege.

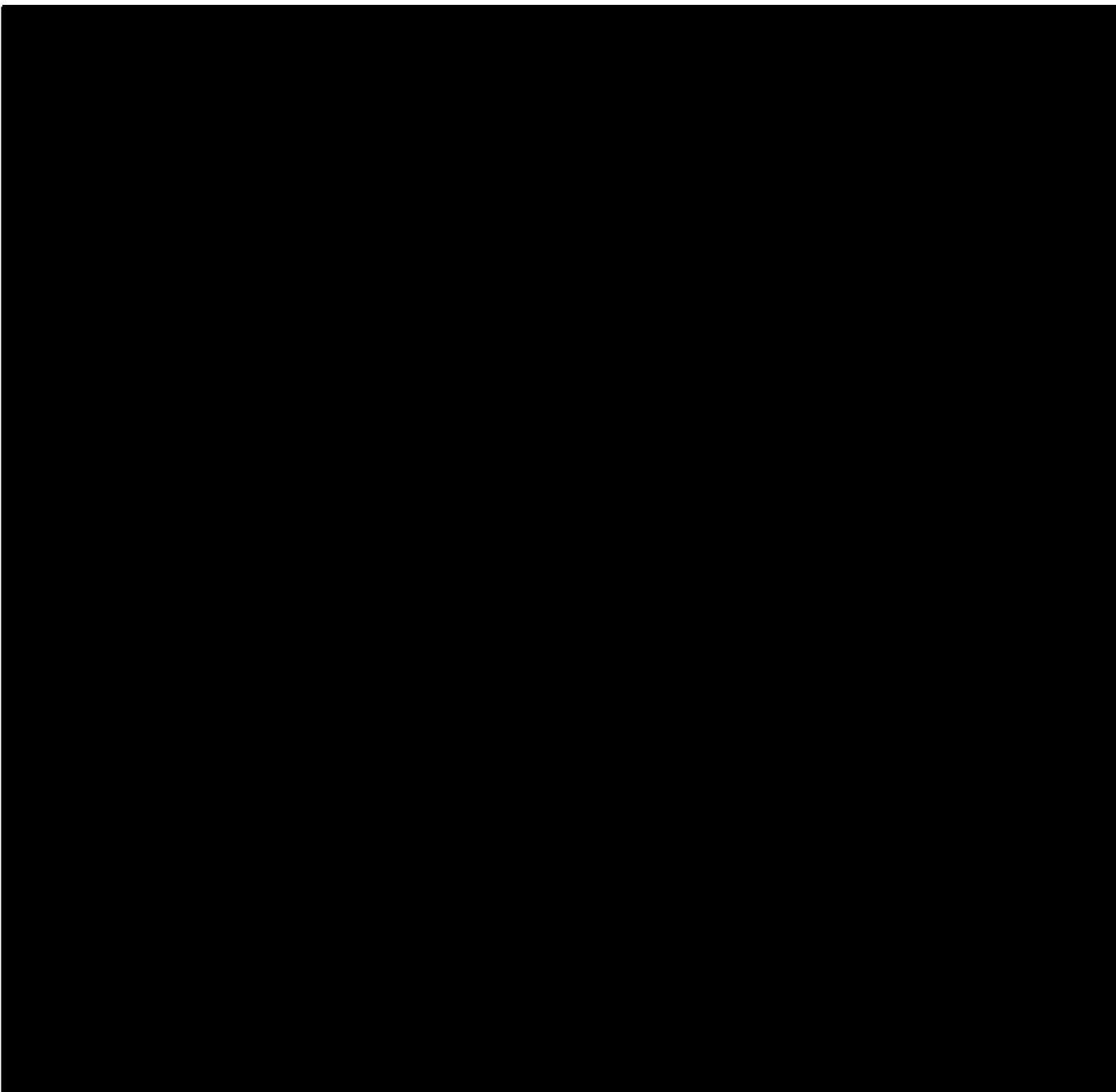
3. This Counterclaim Defendant objects to the interrogatories on the grounds that the number of interrogatories, including subparts, exceeds the limitation on interrogatories.

4. This Counterclaim Defendant objects to the definitions and instructions in the interrogatories to the extent that they render the interrogatory to be confusing, vague, overbroad and unduly burdensome.

### **INTERROGATORIES**

2. Describe all training of any type provided by you to Travis Armstrong, Armstrong Auto Sales, Inc., or any employee of Armstrong Auto Sales, Inc. regarding how to sell, price, or process any of your service contracts, including the identification of any person with knowledge of this training.

**ANSWER:** Wynn's did not provide any training to Travis Armstrong or Armstrong Auto Sales, Inc. Any training would have been performed by Credit Acceptance Corporation ("CAC"). Wynn's provides a Dealer Kit and a rate sheet for dealerships to consult when marketing service contracts.



I hereby affirm, under penalty of perjury, that the foregoing Answers are true and correct to the best of my knowledge and based on the business records of Wynn's Extended Care, Inc.

WYNN'S EXTENDED CARE, INC.

By

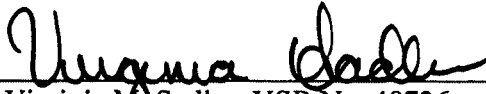


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By



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*Counsel for Wynn's Extended Care, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of Wynn's Extended Care, Inc.'s Answers to Penny L. Bradley's First Set of Interrogatories was e-mailed, this 10th day of August, 2014, to:

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